

City of Austin Summary Comments on the CAMPO 2040 Plan

The City of Austin staff generally concurs with the projects contained within the CAMPO 2040 Plan.

However, based on City policy, enumerated in the *Imagine Austin Plan Comprehensive Plan* and subsequent Council actions, staff raises objection to projects that: do not meet the intents of City policy, exacerbate traffic capacity constraints, pose potential damage in environmentally-sensitive areas or impact City of Austin Water Quality Protection Lands.

City staff requests that policies in the CAMPO 2040 Plan remain consistent with *Imagine Austin* and provide for a transportation system that accommodates the mobility of all ages and abilities. Specifically, policies that support CAMPO Centers and pedestrian and bicycle projects have been changed substantially from the CAMPO 2035 Plan. City of Austin staff is submitting the attached comments on the CAMPO 2040 *Regional Transportation Plan*.

Specifically, City of Austin staff does not support the following Projects as proposed and requests withdrawal of the items. These projects, as well as others proposed in environmentally-sensitive areas, are illustrated in *Map 1* and outlined as follows:

Projects

- **Loop 1, Cesar Chavez to Slaughter, Road Project ID: 102, Sponsor: CTRMA, page 167**
This project is described as increasing the capacity of Loop 1 South with two express lanes in each direction. This differs from what was in the previous, CAMPO 2035 *Regional Transportation Plan*, which proposed the project as only one express lane in each direction. City staff has serious concerns regarding the technical feasibility of the project and the evaluation of the impacts of the project on connecting roadways (for example, the capacity of Cesar Chavez to absorb **two** new direct connects from Mopac South, in addition to the Express lane direct connect from Mopac North planned to open in the next year), as well as the environmental implications of the surrounding area. Moreover, the project is entirely in the City of Austin and Travis County jurisdictions, and as such, City Council should be given the opportunity to understand the proposed project changes. Therefore, ATD requests that the 2040 Project Plan definition remain consistent with the definition in the CAMPO 2035 Plan (one primary express lane in each direction.)
- **SH 45 SW, Loop 1 S to FM 1626, Road Project ID: 114, Sponsor: CTRMA/TxDOT, page 168**
Described as a four-lane tolled freeway with a 2015 Let Year, which is the year that funding is available for a project. This is the Committed, controversial SH 45 SW that was recently environmentally cleared by TxDOT to proceed into final design and construction. The City of Austin objects to the environmental review and mitigation strategy for this proposed project because we believe the FEIS does not support a "Finding of No Significant Impact." Similar to the draft EIS, the FEIS falls short in its consideration of project alternatives, in the transportation analysis, in the evaluation of the effectiveness of temporary and permanent water quality controls, and in its assessment of potential impacts to endangered species, sensitive karst

features, groundwater, and surface water. Additionally, this project is in direct conflict with Imagine Austin, which states under Action LUT A46, "Ensure consistency between the Growth Concept Map Series and regional transportation plans by amending the Austin Metropolitan Area Transportation Plan to remove SH45 SW and requesting its removal from the Capital Area Metropolitan Planning Organization 2035 Regional Transportation Plan."

- **SH 45 SW-E, FM 1626 to IH 35 S, Road Project ID: 115, Sponsor: Hays County/Buda, page 168**
This project is described as the environmental and preliminary engineering analysis for SH 45 SW, from FM 1626 to IH 35. This piece, which would complete SH 45 SW from IH 35 and Loop 1 S, and falls within the City of Austin's extraterritorial jurisdiction (ETJ), is inconsistent with *Imagine Austin*, as noted above, and the City is on record in opposition to SH 45 SW in this area.
- **Garlic Creek Dr., SH 45 SW to RM 967, Road Project ID: 301, Sponsor: Buda, page 178**
This project is described as a new, four-lane divided roadway that would be 100% Locally Funded, with a 2025 Let Year. While only a small portion falls within the City's ETJ, this project would provide a new north/south thoroughfare that would connect to SH 45 SW between FM 1626 and IH 35 (Road Project ID 115). This project anticipates the construction of the above two segments of SW 45 from Loop 1 to I-35 which the City has objected to.
- **Proposed elevated Toll Road, RM 620 South of 2222 to SH 45 S, Illustrative List, Sponsor: Lakeway, page 205,**
The proposed project is similar to the 1984 "SH 45 Western Outer Loop", and is a study in the Illustrative List for a six-lane, elevated toll road. This proposed new roadway would traverse through the City's full-purpose jurisdiction and ETJ, and through areas designated in the Balcones Canyonlands Conservation Plan (BCCP) and put the City and Travis County's federal permit to protect endangered species at risk. In addition, the project would require a new western bridge over Lake Austin, and cross City of Austin Water Quality Protection Lands (WQPL), which can pose a threat to the quality of future City of Austin water supplies. While the Austin Transportation Department (ATD) is on record for objecting to this project, the City of Austin's Watershed Protection Department and Austin Water Utility would also like to emphasize that they too do not support this project due to environmental issues and constraints. *Map 1* demonstrates the project is contrary to *Imagine Austin* and City staff will request that it not be considered for further study. Austin Transportation Department (ATD) staff requests that alternative, existing roadways be considered for further study to address the mobility concerns of this area (e.g. Loop 360, RM 620, RM 2222, and SH 71).
- **NF 13, RM 1826 to FM 150, Illustrative List, Sponsor: Hays County, page 208**
This project replaced what would have been the Escarpment extension to connect SH 45, west of Loop 1 S, to FM 150 in Hays County. This project is presently described as a **new**, two-lane undivided, major arterial, which would provide a north/south connection between RM 1826 to FM 150. While much of the proposed project falls outside of City of Austin jurisdiction, it would traverse through the City's Water Quality Protection Lands and/or Conservation Easements that are protected in perpetuity, that were authorized by voters to protect source water watersheds that serve Barton Springs, and can pose a threat to the quality of future City of Austin water

supplies, thus negatively impacting the City of Austin. City staff has pointed this out on multiple occasions and continues to request that this project be removed.

In addition to the specific projects outlined above, several roadway projects in the Road Project list will likely impact City of Austin Water Quality Protection Lands, either Fee Simple or Conservation Easements. The apparent expansion of these **existing roadways**, which would require additional right-of-way (ROW), appears to encroach upon the protected lands. Any expansion of the ROWs of these segments that result in a taking of City land is anticipated to require condemnation and a change in use triggering a Chapter 26 hearing (Chapter 26 of the Texas Parks and Wildlife Code). In some cases these lands also have a Federal nexus, which is a partnership that was formed with the Federal government to preserve these lands. The following problem projects are:

- Road Project ID 146, FM 150 W, RM 12 to FM 1826
- Road Project ID 148, FM 150 W, FM 3237 to Kyle Loop SW
- Road Project ID 159, FM 967, FM 1826 to FM 1626
- Road Project ID 188, FM 3238, RM 12 to SH 71 W
- Road Project ID 207, RM 1826, Slaughter Lane to SH 45 SW
- Road Project ID 294, Fitzhugh, US 290 W to County Line

In general, City of Austin staff believes it is important to safeguard its investments in environmentally-sensitive lands that protect the quality of future City of Austin water supplies. Roadway projects that encroach on City, protected lands are a major concern. Superior environmental protection for sensitive waterbodies and the Barton Springs segment of the Edwards Aquifer (BSEA) is highly desired. In addition, coordination with local governments to understand documented flooding problems could improve future planning efforts in the alignment of projects.

Policies

City staff requests that policies in the CAMPO 2040 Plan to not deviate from the watershed policies adopted for CAMPO 2035 Plan. The proposed changes, as listed below in CAMPO 2040 have the impact of diluting the policies adopted for CAMPO 2035 that actively supported Centers and alternate forms of transportation for transit riders, pedestrians and cyclists.

- **Centers Policies**

Policy 1 concerns the 50% target of CAMPO Surface Transportation Program – Metropolitan Mobility (STP-MM) federal funds to support development of the mixed-use activity centers included in the CAMPO Centers Map. **Policy 16** is related, but more generally states that the region supports the development of high density, mixed-use activity centers in the locations shown on the CAMPO Centers Map.

- **Policy 1**, although the 2040 remains consistent with the adopted CAMPO 2035 Plan language (*see table below), City staff requests the actual call for STP-MM Call for Project applications and eligibility requirements should assure that funding is available primarily to multimodal and new connectivity projects versus added-capacity connectivity projects that supported mixed-

use, walkable development in Centers (added capacity highway projects or arterial expansions that do not directly support the development of people-oriented places).

- **Policy 16** (*see table below) has been modified since the CAMPO 2035 Plan to be more general in nature and loses its specificity that provided for a reasonable performance target and encouragement for Centers in terms of accommodation of employment and population. City staff requests that this policy language maintain the full existing CAMPO 2035 Plan language.
- **Pedestrian Bicycle and Policies**
Policy 2 in 2040 **changes a firm 15% “allocation” of CAMPO discretionary federal funding (STP-MM) to pedestrian and bicycle projects to a achieving only a “target” of 15%.** The change from “allocate” to “target” has the effect of diluting support for pedestrian and bicycle funding that significantly improve traveler safety. In addition the Pedestrian and Bicycle Districts included in the 2035 Plan have been eliminated from the 2040 Plan. City staff requests the reinstatement of the 2035 language versus the 2040 language.
- **Policy 12** 2040 reduces the focus on pedestrian infrastructure by changing “**provide pedestrian facilities**” (in 2035) to “**encourage implementation**” of pedestrian facilities for new or reconstruction projects. This does not assure that pedestrian safety issues will continue to be a focus of the region. City staff requests the reinstatement of the 2035 language versus the 2040 language.
- **Policy 13**, similar to Policy 12, reduces the focus on bicycle infrastructure by changing “**provide bicycle facilities**” (in 2035) to “**encourage implementation**” of bicycle facilities for new or reconstruction projects. This does not assure that bicycle safety issues will continue to be a focus of the region. City staff requests the reinstatement of the 2035 language versus the 2040 language.

- ***The Table below compares wording changes between certain policies from the CAMPO 2035 Plan and the CAMPO 2040 Plan.**

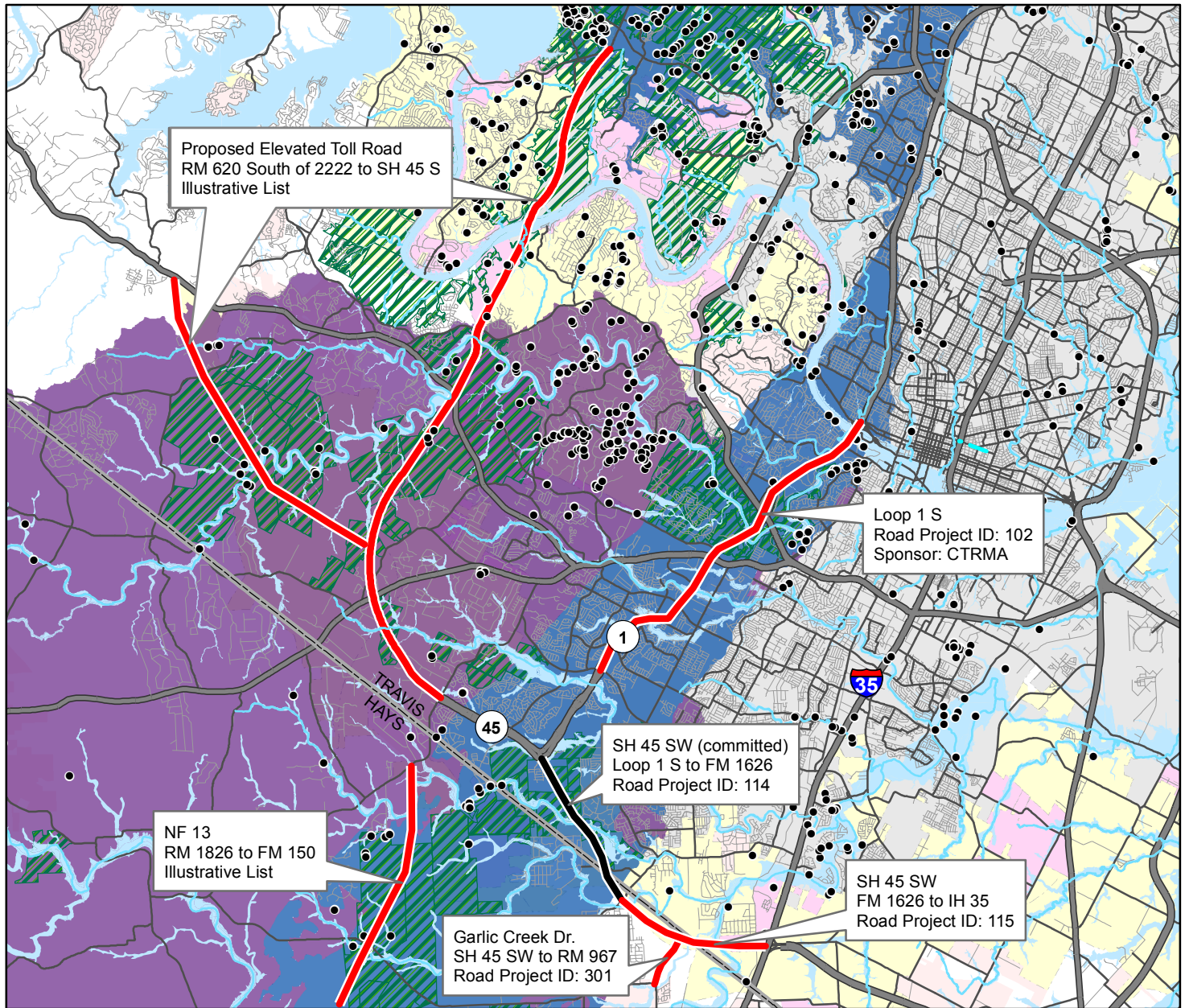
Staff requests adherence to the 2035 Plan Language in lieu of the 2040 Plan language proposed to the right.			
2035 Plan Policy Language		2040 Plan Policy Language	
Policy 3 (same as 2040)	Target 50 percent of available CAMPO discretionary federal funding (STP-MM) to support development of the mixed use activity centers indicated on the CAMPO Centers Map. (The same project may address both the 15% bicycle and pedestrian set aside and the 50% Centers set aside policies.)	Policy 1 (same as 2035)	Target 50 percent of available CAMPO discretionary federal funding (STP-MM) to support development of the mixed-use activity centers indicated on the CAMPO Centers Map. (The same project may address both the 15% bicycle and pedestrian, and the 50% Centers target policies.) <i>Note – 2040 Plan language the same as 2035 Plan language; providing for reference only.</i>
Policy 4	Allocate at least 15 percent of available CAMPO discretionary federal funding (STPMM) to bicycle and pedestrian projects through the CAMPO TIP process, using the Priority Pedestrian Districts Map and Priority Regional Bicycle Corridors Map in the project evaluation. (The same project may address both the 15% bicycle and pedestrian set aside and the 50% Centers set aside policies.)	Policy 2	Target 15 percent of available CAMPO discretionary federal funding (STP-MM) to bicycle and pedestrian projects through the CAMPO TIP process. (The same project may address both the 15% bicycle and pedestrian, and the 50% Centers target policies.)
Policy 19	Provide pedestrian facilities with all new construction and reconstruction of regionally significant roadways and bridges shown on the Priority Pedestrian Districts Map as “high” or “medium priority “near-term” or “long-term” districts in alignment with the project open date, unless the jurisdiction constructing the roadway has demonstrated that the providing the pedestrian facility is not feasible due to excessive cost been granted a waiver in accordance with the CAMPO Pedestrian Waiver Procedure. “Near-Term” Districts – Projects opening in 2013 and beyond “Long-Term” Districts – Projects opening in 2026 and beyond. (Projects in the Long-Term Districts opening prior to 2026 are	Policy 12	Encourage implementation of pedestrian facilities with new construction and major rehabilitation of regionally significant roadways at the major arterial functional classification or higher. Consideration of the need for such facilities and their implementation should be considered in the context of local government needs and long-term community goals.

Staff requests adherence to the 2035 Plan Language in lieu of the 2040 Plan language proposed to the right.			
2035 Plan Policy Language		2040 Plan Policy Language	
	required to complete pedestrian facility design and preserve right-of-way for later construction.)		
Policy 20	Provide bicycle facilities with all new construction and reconstruction of regionally significant roadways and bridges shown on the Priority Bicycle Corridors Map as “high” or “medium priority unless the jurisdiction constructing the roadway has demonstrated that the providing the bicycle facility is not feasible due to excessive cost.	Policy 13	Encourage implementation of bicycle facilities with new construction and major rehabilitation of regionally significant roadways at the major arterial functional classification or higher. Consideration of the need for such facilities and their implementation should be considered in the context of local government needs and long-term community goals.
Policy 26	Support development of high density, mixed use activity centers in the locations shown on the CAMPO Centers map, and work with local jurisdictions and others to accommodate 31% of regional population and 38% of regional jobs in activity centers shown on the CAMPO Centers map by 2035. CAMPO will support achievement of the goals through activities such as: monitoring and reporting on growth and investment in the Centers, dissemination of best practices and tools, planning support, and funding for transportation investments. As appropriate, member jurisdictions will support development of centers through local planning and other methods.	Policy 16	Support development of high density, mixed-use activity Centers in the locations shown on the CAMPO Centers map.

CAMPO 2040 Regional Transportation Plan

Proposed Projects referenced in COA Summary Comments

Map 1



Legend

- Springs
- Creek Centerlines
- Greater Austin FEMA Floodplain
- WQPL & BCP Boundaries
- Edwards Aquifer Recharge Zone
- Edwards Aquifer Contributing Zone
- 2 MILE ETJ
- 5 MILE ETJ
- Full Purpose City of Austin
- Limited Purpose
- Other City Limits

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